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April 7, 2025

VIA ECF & EMAIL (Failla_NYSDChambers@nysd.uscourts.gov)

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: B.G., et al. v. City of New York, et al.
Case: 1:23-cv-03761 (KPF)
Our File No. 267805-F100

Dear Judge Failla:

In accordance with Your Honor's February 10, 2025 order, counsel for all parties submit this letter update on the status of settlement discussions, the necessity of extending the partial stay of discovery, and a revised scheduling order.

Since the February 10, 2025 order, the parties have continued to engage in *ex parte* settlement discussions with Magistrate Judge Robyn F. Tarnofsky. The settlement discussions have addressed injunctive relief and monetary damages and are progressing. As the settlement discussions continue to be productive, the parties are hopeful that the relevant settlement terms can be finalized in the near future.

In light of the ongoing settlement discussions, the parties respectfully request an extension of two additional months to potentially resolve this case and a concomitant extension of the partial stay of discovery. This is the parties' seventh request for an extension of the partial stay of discovery.

Should a partial stay remain in place, the parties also respectfully request that a revised scheduling order be submitted at a later time. Depending on whether the parties can finalize the settlement discussions, the parties can provide a future update to Your Honor on the issue of a revised scheduling order.

Considering the above, we respectfully request an extension until June 9, 2025 to provide a status update and respond as to whether a revised scheduling order is needed.

Thank you for your continued consideration and attention in this matter.

Respectfully,

ROBERT T. REILLY

By: /s/ Junou M. Odige
JUNOU M. ODIGE
KEITH J. GROSS
Of Counsel

KJG:JMO/ts

c: Hon. Robyn F. Tarnofsky
(via email TarnofskyNYSDCChambers@nysd.uscourts.gov)

Counsel for Plaintiffs & Defendants (via ECF)

Application GRANTED. The parties shall file a letter update concerning, as appropriate, the status of settlement discussions, the necessity of extending the partial stay of discovery, and / or a revised scheduling order on or before **June 9, 2025**.

The Clerk of Court is directed to terminate the pending motion at docket entry 66.

Dated: April 7, 2025
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE